

**Proposed Variation to the Licence Conditions Rule 2011 – 2nd Round Public
Consultation – Speedcast PNG Limited**

Speedcast PNG thanks the NICTA for providing us with the opportunity to provide comments to the proposed changes to the licence conditions of the Individual licences.

We are generally supportive of the changes proposed although have the following comments:

Schedule 4, Clause 6. Licensee’s Satellite Network and Operations

(3) The Licensee shall use best efforts to shut down any website as may be lawfully directed by NICTA and otherwise will follow its internal blocking program.

Speedcast comment - This will be on a best efforts basis as this will depend on equipment capabilities. We strongly feel that exceptions from this condition should be provided to network operators that focus on the enterprise market – this requirement is typically for operators for the consumer market.

Schedule 4, Clause 7. Development of Network and Services and extension of Broadband Services in collaboration with Licensed Operators in PNG

(2) The Licensee shall enter into one or more commercial arrangements with licensed telecommunications network operators in Papua New Guinea to extend broadband telecommunications services through the provision of backhaul capacity and or “satellite to cell services” for the purposes of accelerating and expanding broadband telecommunications services throughout Papua New Guinea.

Speedcast comment – Speedcast is supportive of the requirement to collaborate with licensed providers to extend broadband telecommunications throughout PNG. However we are concerned about this being made mandatory for LEO network providers as being able to fulfil this condition is very much subject to cooperation by other licensed operators in PNG that may not be open to such collaboration. Rather than make this requirement mandatory for LEO network providers, we propose that it be on a best efforts basis and that NICTA may be required/ asked to intervene in the event that there are challenges in getting the required collaboration with other licensed providers.

As always please do feel free to reach out should you have any questions regarding the above.

Thank you.

Elaine Chow